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November 26, 2018

Our Ref: 263-15/WDM

Via ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007-1312

The deadline to file any motion to reopen in these cases is hereby extended to January 31, 2018. The Clerk of Court is directed to terminate the motions in all three cases (filed earlier today).

SO ORDERED.

Re: **BMW, et al. v. M/V COURAGE, et al.**
Docket No.: 16 Civ. 4063 (JMF)
Docket No.: 16 Civ. 4125 (JMF)
Docket No.: 16 Civ. 4149 (JMF)



November 27, 2018

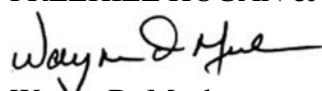
Dear Judge Furman:

We represent the Vessel Interests in the captioned litigation. We are writing to request that the case be re-opened to allow the parties time to finalize the closing documentation and settlement. The deadline for seeking reopening is November 28, 2018. This is the first request for an extension. All parties consent to this request.

As advised on October 29, 2018, the parties were able to reach an agreement on settlement of all remaining claims. The parties thereafter prepared a draft settlement agreement, but we have not yet received final approval on the terms from all parties. Furthermore, we understand that once the settlement agreement is finalized, it usually takes about six weeks for USA to be able to process the payment. Accordingly, we respectfully request that the case be re-opened for a period of 60 days to allow the parties the time to finalize the paperwork and effect the settlement.

We thank the Court for its consideration.

Respectfully submitted,
FREEHILL HOGAN & MAHAR LLP



Wayne D. Meehan

WDM/lb

cc: All counsel of record via ECF

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